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November 7, 2001

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116

RE: Olefins Panel Test Plan for Propylene Streams, HPV Registration No.

Dear Ms. Whitman:

The Olefins Panel of the American Chemistry Council submits its test plan for Propylene Streams under the High Production Volume (HPV) Challenge Program. Please note that these streams are mixtures comprised primarily of propylene and propane. Propylene is sponsored by the CEFIC Lower Olefins Sector Group in the ICCA program and propane is sponsored by the API HPV Petroleum Testing Group under the HPV Challenge Program. Thus, the Panel is not proposing to conduct any testing on these streams, but is proposing to use the robust summaries on new and existing data generated by these sponsors to characterize the toxicity of the streams.

In preparing this test plan, the Panel has given careful consideration to the principles contained in the letter EPA sent to all HPV Challenge Program participants on October 14, 1999. As requested by EPA in that letter, the Panel has sought to maximize the use of scientifically appropriate categories of related chemicals and of structure activity relationships. The Panel has coordinated with other industry groups covering related chemicals. Additionally, and also as requested in EPA's letter, in analyzing the adequacy of existing data, the Panel has conducted a thoughtful, qualitative analysis rather than use a rote checklist approach. The Panel has taken the same thoughtful approach when developing this revised test plan and believes it conforms to those principles.

If you have any questions, please call me at (301) 924-2006.

Elizabeth J. Moran, Ph.D. /
Manager, Olefins Panel

cc: C. Auer, EPA
B. Leczynski
R. Hefter, EPA